

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:)	CHAPTER 11
PANHANDLE IRON & SCRAP, INC.,)	CASE NO. 16- <u>10012</u>
SPECALLOY CORPORATION,)	CASE NO. 16- <u>10013</u>
DEBTORS.)	

**MOTION FOR ORDER, PURSUANT TO RULE 1015(b),
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
DIRECTING JOINT ADMINISTRATION**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby move the Court (the "Motion") for entry of an order granting joint administration of their respective chapter 11 cases. Pursuant to rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rule") and in support of the Motion, the Debtors respectfully represent as follows:

Jurisdiction

1. This Court has jurisdiction over this Motion under 28 U.S.C. §§157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2)(A), and (O).
2. Venue of these chapter 11 cases in this District is proper under 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicates for the relief requested herein are section 105(a) of title 11 of the United States Bankruptcy Code (the "Bankruptcy Code") and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:)	CHAPTER 11
PANHANDLE IRON & SCRAP, INC.,)	CASE NO. 16- <u>10012</u>
SPECALLOY CORPORATION,)	CASE NO. 16- <u>10013</u>
DEBTORS.)	

**MOTION FOR ORDER, PURSUANT TO RULE 1015(b),
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
DIRECTING JOINT ADMINISTRATION**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby move the Court (the "Motion") for entry of an order granting joint administration of their respective chapter 11 cases. Pursuant to rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rule") and in support of the Motion, the Debtors respectfully represent as follows:

Jurisdiction

1. This Court has jurisdiction over this Motion under 28 U.S.C. §§157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2)(A), and (O).
2. Venue of these chapter 11 cases in this District is proper under 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicates for the relief requested herein are section 105(a) of title 11 of the United States Bankruptcy Code (the "Bankruptcy Code") and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

Background

4. On the January 5, 2016 hereof (the "Petition Date"), the Debtors' filed their voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the "Chapter 11 Cases"). The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner or committee has been appointed in these cases.

Relief Requested

5. In order to optimally and economically administer the Debtors pending chapter 11 cases, such cases should be jointly administered, for procedural purposes only, under the case number assigned to Panhandle Iron & Scrap, Inc., pursuant to Rule 1015(b) of the Federal Bankruptcy Rules. Many of the motions, hearings and orders that will arise in these chapter 11 cases will jointly affect each and every Debtor. By jointly administering the Debtors' chapter 11 cases, the Debtors will be able to reduce fees and costs resulting from the administration of these cases and ease the onerous administrative burden of having to file multiple documents.

6. The rights of the Debtors' respective creditors will not be adversely affected by the joint administration of these chapter 11 cases because this Motion requests only administrative, not substantive, consolidation of the estates. Thus, all of the Debtors' creditors will benefit from the reduced costs as the result of such joint administration. This Court also will be relieved of the burden of entering duplicate orders and maintaining duplicate files. Finally, supervision of the administrative aspects of these chapter 11 cases by the Bankruptcy Administrator's Office will be simplified.

Background

4. On the January 5, 2016 hereof (the "Petition Date"), the Debtors' filed their voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the "Chapter 11 Cases"). The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner or committee has been appointed in these cases.

Relief Requested

5. In order to optimally and economically administer the Debtors pending chapter 11 cases, such cases should be jointly administered, for procedural purposes only, under the case number assigned to Panhandle Iron & Scrap, Inc., pursuant to Rule 1015(b) of the Federal Bankruptcy Rules. Many of the motions, hearings and orders that will arise in these chapter 11 cases will jointly affect each and every Debtor. By jointly administering the Debtors' chapter 11 cases, the Debtors will be able to reduce fees and costs resulting from the administration of these cases and ease the onerous administrative burden of having to file multiple documents.

6. The rights of the Debtors' respective creditors will not be adversely affected by the joint administration of these chapter 11 cases because this Motion requests only administrative, not substantive, consolidation of the estates. Thus, all of the Debtors' creditors will benefit from the reduced costs as the result of such joint administration. This Court also will be relieved of the burden of entering duplicate orders and maintaining duplicate files. Finally, supervision of the administrative aspects of these chapter 11 cases by the Bankruptcy Administrator's Office will be simplified.

7. Based upon the foregoing, the joint administration of the above-captioned cases is in the best interests of the Debtors, their creditors and equity security holders, and all parties in interest. Accordingly, the Debtors request that the caption of their chapter 11 cases be modified to reflect the joint administration of the chapter 11 cases, as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

In re:)	Chapter 11
)	
PANHANDLE IRON & SCRAP, INC., ¹)	Case No. 16- <u>10012</u>
)	(Jointly Administered)
Debtors.)	

Notice

8. Notice of this Motion has been given to (A) the Bankruptcy Administrator's office, (B) all secured creditors and (C) the twenty (20) largest unsecured creditors for each Debtor. In light of the nature of the relief requested, the Debtors submit that no further notice is required.

No Prior Request

9. No prior motion for relief requested herein has been made to this or any other Court.

WHEREFORE, each of the Debtors respectfully requests that the Court enter an Order, substantially in the form attached hereto, (a) authorizing the joint administration of the Panhandle Iron & Scrap, Inc. chapter 11 case with the chapter 11 case of SpecAlloy

¹The Debtors are the following: Panhandle Iron & Scrap, Inc., and SpecAlloy Corporation

7. Based upon the foregoing, the joint administration of the above-captioned cases is in the best interests of the Debtors, their creditors and equity security holders, and all parties in interest. Accordingly, the Debtors request that the caption of their chapter 11 cases be modified to reflect the joint administration of the chapter 11 cases, as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

In re:)	Chapter 11
)	
PANHANDLE IRON & SCRAP, INC., ¹)	Case No. 16- <u>10012</u>
)	(Jointly Administered)
Debtors.)	

Notice

8. Notice of this Motion has been given to (A) the Bankruptcy Administrator's office, (B) all secured creditors and (C) the twenty (20) largest unsecured creditors for each Debtor. In light of the nature of the relief requested, the Debtors submit that no further notice is required.

No Prior Request

9. No prior motion for relief requested herein has been made to this or any other Court.

WHEREFORE, each of the Debtors respectfully requests that the Court enter an Order, substantially in the form attached hereto, (a) authorizing the joint administration of the Panhandle Iron & Scrap, Inc. chapter 11 case with the chapter 11 case of SpecAlloy

¹The Debtors are the following: Panhandle Iron & Scrap, Inc., and SpecAlloy Corporation

Corporation under the case number assigned to Panhandle Iron & Scrap, Inc., and (b) granting such other relief as the Court deems just and proper.

Respectfully submitted this 5th day of January, 2016.

/s/ Cameron A. Metcalf 
Cameron A. Metcalf
Attorney for DIPs
P.O. Drawer 6504
Dothan, Alabama 36302-6504
(334) 793-6288
(334) 712-1617 Fax
Email: cam@espymetcalf.com

Certificate of Service

I, Cameron A. Metcalf, do hereby certify I have this date mailed a copy of the above and foregoing upon Teresa Jacobs, Bankruptcy Administrator, One Church Street, Montgomery, Alabama 36104, all secured creditors and the 20 largest unsecured creditors in each case as attached by placing a copy of same U.S. Mail, postage prepaid, facsimile and/or by electronic notice this 5th day of January, 2016.

/s/ Cameron A. Metcalf
Cameron A. Metcalf

Corporation under the case number assigned to Panhandle Iron & Scrap, Inc., and (b) granting such other relief as the Court deems just and proper.

Respectfully submitted this 5th day of January, 2016.

/s/ Cameron A. Metcalf 
Cameron A. Metcalf
Attorney for DIPs
P.O. Drawer 6504
Dothan, Alabama 36302-6504
(334) 793-6288
(334) 712-1617 Fax
Email: cam@espymetcalf.com

Certificate of Service

I, Cameron A. Metcalf, do hereby certify I have this date mailed a copy of the above and foregoing upon Teresa Jacobs, Bankruptcy Administrator, One Church Street, Montgomery, Alabama 36104, all secured creditors and the 20 largest unsecured creditors in each case as attached by placing a copy of same U.S. Mail, postage prepaid, facsimile and/or by electronic notice this 5th day of January, 2016.

/s/ Cameron A. Metcalf
Cameron A. Metcalf

PANHANDLE IRON & SCRAP, INC.
868 MURRAY ROAD
DOTHAN AL 36303

ADVANCED FIRE & SAFETY INC
2390 WESTGATE PKWY
DOTHAN AL 36303

ADVANCED SCALE COMPANY LLC
P.O. BOX 70192
ALBANY GA 31708

AMERICAN EXPRESS
P.O. BOX 650448
DALLAS TX 75265-0448

BRINKS INCORPORATED
P.O. BOX 101031
ATLANTA GA 30392-1031

COFFMAN INTERNATIONAL, INC.
4185 ROSS CLARK CIRCLE
DOTHAN AL 36303

FERRALLGAS
P.O. BOX 173940
DENVER CO 80217-3940

GETS INC.
P.O. BOX 1922
DOTHAN AL 36302-1922

HOME OIL COMPANY
5744 EAST US HWY 84
COWARTS AL 36321

PANHANDLE CONVERTER RECYCLING
868 MURRAY ROAD
DOTHAN AL 36303

PERIMETER SECURITY SYSTEMS INC
1000 UPPER ASHBURY AVENUE
CHARLOTTE NC 28206

PORTABLE TOILET SERVICES
P.O. BOX 1127
DOTHAN AL 36302

REGIONS COMMERCIAL LOAN DEPT
P.O. BOX 2224
BIRMINGHAM AL 35287-2521

TEREX FINANCIAL SERVICES
12460 COLLECTIONS CENTER DRIVE
CHICAGO IL 60693

TERMINEX
P.O. BOX 742592
CINCINNATI OH 45274-2592

THOMPSON TRACTOR CO INC
P.O. BOX 934005
ATLANTA GA 31193-4005

TIME WARNER CABLE
P.O. BOX 70872
CHARLOTTE NC 28272-0872

UNIFIRST CORPORATION
208 S EDGEWOOD DRIVE
DOTHAN AL 36301

WELLS FARGO C/O ERIC L. PRUITT,
ESQ.
420 20TH STREET NORTH
1400 WELLS FARGO TOWER
BIRMINGHAM AL 35203

WELLS FARGO EQUIPMENT FINANCE
733 MARQUETTE AVENUE, STE 700
MINNEAPOLIS MN 55402

ATTORNEY GENERAL OF UNITED
STATES
950 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20530-0001

SECRETARY OF TREASURY
5TH AVENUE PENNSYLVANIA NW
WASHINGTON DC 20220

U.S. DEPT OF JUSTICE
P.O. BOX 14198
WASHINGTON DC 20044

U.S. SECURITIES & EXCHANGE COMM
ATLANTA REGIONAL OFFICE
3475 LENOX ROAD, NE, STE 1000
ATLANTA GA 30326

UNITED STATES ATTORNEY
MIDDLE DISTRICT OF ALABAMA
PO BOX 197
MONTGOMERY AL 36101-0197

SPECCALLOY CORPORATION
868 MURRAY ROAD
DOTHAN AL 36303

ADVANCED MECHANIX
947 N BEVERLYE ROAD
DOTHAN AL 36303

ADVANTAGE STAFFING
P.O. BOX 277534
ATLANTA GA 30384-7534

AGF MACHINERY, LLC
1760 REEVES STREET
DOTHAN AL 36303

AIRGAS
P.O. BOX 532609
ATLANTA GA 30353-2609

ALABAMA TECHNOLOGY NETWORK
P.O. BOX 302130
MONTGOMERY AL 36130-2130

ALLSOUTH URGENT CARE CLINIC INC
4585 MONTGOMERY HWY
DOTHAN AL 36303

ANDERSEN SALES & SALVAGE
1490 EAST 8TH STREET
GREELEY CO 80631

AT&T
P.O. BOX 5080
CAROL STREAM IL 60197-5080

AUTOMATION DIRECT.COM, INC.
P.O. BOX 402417
ATLANTA GA 30384

AUTOMOTIVE RECYCLERS
ASSOCIATION
9113 CHURCH STREET, STE 2
MANASSAS VA 20110

CARR ALLISON
100 VESTAVIA PARKWAY
BIRMINGHAM AL 35216

CH ROBINSON
P.O. BOX 9121
MINNEAPOLIS MN 55480-9121

CIRCLE PEST CONTROL
P.O. BOX 6932
DOTHAN AL 36302

COFFMAN INTERNATIONAL INC
4185 ROSS CLARK CIRCLE
DOTHAN AL 36303

DOTHAN AREA CHAMBER OF
COMMERCE
P.O. BOX 638
DOTHAN AL 36302

EXPRESS EMPLOYMENT
PROFESSIONALS
P.O. BOX 535434
ATLANTA GA 30353-5434

FCCI INSURANCE GROUP
P.O. BOX 405563
ATLANTA GA 30384-5563

FERRELLGAS
P.O. DRAWER 430
DOTHAN AL 36301

FLORIDA TURNPIKE
FDOT TURNPIKE ENTERPRISE
P.O. BOX 310
OCOE FL 34761-0100

GETS INC
P.O. BOX 1922
DOTHAN AL 36302

HEALTHLINK
2946 ROSS CLARK CIRCLE
DOTHAN AL 36301

HEESUNG PMTECH CORP
5TH FLOOR, BULIM BLDG
39 NANDAEMUNDO-, 9 GIL, JUNG-GU
SEOUL KOREA SOUTH

IBS OF SOUTHERN ALABAMA
P.O. BOX 8751
DOTHAN AL 36304

IDHN
2650 EAST DIVISION STREET
SPRINGFIELD MO 65803

J&N MACHINE SHOP LLC
171 NORTH RANGE STREET
DOTHAN AL 36303

LEDOUX & COMPANY
359 ALFRED AVENUE
TEANECK NJ 07666-5755

LITCO INTERNATIONAL
ONE LITCO DRIVE
VIENNA OH 44473

LKQCORP
500 WEST MADISON STREET, STE 2800
CHICAGO IL 60661

MARTIN ENVIRONMENTAL
P.O. BOX 8623
DOTHAN AL 36304

MCMASTER-CARR SUPPLY
600 N. COUNTY LINE ROAD
ELMHURST IL 60126

NOLAN TRANSPORTATION GROUP,
INC.
75 REMITTANCE DRIVE, DEPT 132
CHICAGO IL 60675-3132

PERFORMANCE MACHINE WORKS LLC
344 SOUTHGATE ROAD
DOTHAN AL 36301

SCRAP MAGAZINE
1615 L STREET NW, STE 600
WASHINGTON DC 20036-5664

SERVICE INDUSTRIAL SUPPLY
P.O. BOX 1347
DOTHAN AL 36302-1347

SOUTHEASTERN FREIGHT LINES
P.O. BOX 100104
COLUMBIA SC 29202

SOUTHERN BLOW PIPE INC
377 BIC ROAD
DOTHAN AL 36303

SOUTHERN HYDRAULIC SERVICES,
INC.
1415 SOUTH OATES STREET
DOTHAN AL 36301

THE LILLY COMPANY
P.O. BOX 100575
BIRMINGHAM AL 35210

THE LOCATOR
P.O. BOX 286
WHITING IA 51063-0286

THE PEPI COMPANIES
165 TECHNOLOGY DRIVE
DOTHAN AL 36303

ULINE
125875 ULINE DRIVE
PLEASANT PRAIRIE WI 53158

UNIFIRST CORPORATION
208 SOUTH EDGEWOOD DRIVE
DOTHAN AL 36301

UPS
P O BOX 7247-0244
PHILADELPHIA PA 19170

WELLS FARGO C/O ERIC L. PRUITT,
ESQ.
420 20TH STREET NORTH
1400 WELLS FARGO TOWER
BIRMINGHAM AL 35203

WRENCH A PART
5055 HWY 71E
DEL VALLE TX 78617

ATTORNEY GENERAL OF UNITED
STATES
950 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20530-0001

SECRETARY OF TREASURY
15TH AVENUE PENNSYLVANIA NW
WASHINGTON DC 20220

U.S. DEPT OF JUSTICE
P.O. BOX 14198
WASHINGTON DC 20044

U.S. SECURITIES & EXCHANGE COMM
ATLANTA REGIONAL OFFICE
3475 LENOX ROAD, NE, STE 1000
ATLANTA GA 30326

UNITED STATES ATTORNEY
MIDDLE DISTRICT OF ALABAMA
PO BOX 197
MONTGOMERY AL 36101-0197